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*Sentencing adjourned
until 5/22/2020
@ 11:00 am.*

BENNETT M. EPSTEIN, ESQ.
SARAH SACKS, ESQ.

February 19, 2020

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
Via ECF

Chas. M. Epstein
Re: United States v. Edwin Gonzalez
19 Cr. 708 (AKH)

2/21/2020

Dear Judge Hellerstein:

We represent the above named defendant pursuant to the Criminal Justice Act. He has pleaded guilty to a Hobbs Act robbery and is scheduled to be sentenced by the Court on March 6, 2020 at 11 am.

The purpose of this letter is to request a two-month adjournment of sentencing in this case. The Government, per AUSA Michael Herman, consents.

The reason for this request is that we need additional time to prepare our sentencing submission. We have received a voluminous response to our Court-ordered subpoenas for his records, including Family Court and Special Education records, and we are still waiting for additional materials which we anticipate will demonstrate sentencing factors to the Court. In addition, we are waiting for a State matter to be resolved in the Bronx, which may have bearing on his custody and the place where his sentence might be served. We have been told by his Bronx Defender attorney that the adjournment we are requesting from this Court would facilitate that determination.

Please contact us if there are any questions or concerns.

Very truly yours,

Bennett M. Epstein

Bennett M. Epstein

cc. via email to Michel Herman, Esq.